

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
JOANN INC., <i>et al.</i> , ¹)	Case No. 25-10068 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket Nos. 760 & 864

**CERTIFICATION OF COUNSEL REGARDING FIRST NOTICE
OF ASSUMPTION AND ASSIGNMENT OF CERTAIN
EXECUTORY CONTRACTS AND/OR UNEXPIRED LEASES**

The undersigned counsel to JOANN Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On April 28, 2025, the Debtors filed the *First Notice of Assumption and Assignment of Certain Executory Contract and/or Unexpired Leases* [Docket No. 760] (the “First Assumption Notice”) regarding the assumption and assignment of certain unexpired leases set forth on Schedule 2 to the First Assumption Notice (the “Original Assumption List”). Attached as Schedule 3 to the First Assumption Notice was a proposed form of order (the “Assumption Order”) authorizing the assumption and assignment of the unexpired leases on the Original Assumption List.

2. The deadline to object to the First Assumption Notice was May 12, 2025 (the “Objection Deadline”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

3. Prior to the Objection Deadline, on May 12, 2025, MFBY Ocala LLC (the “Landlord” or “MFBY”), filed the *Objection of MFBY Ocala LLC to First Notice of Assumption and Assignment of Certain Executory Contract[s] and/or Unexpired Leases [Massa Furniture, Inc.]* [Docket No. 864] (the “MFBY Objection”) objecting to the assumption and assignment of a certain nonresidential real property lease (the “Lease Agreement”) dated November 10, 1980 between Jo-Ann Stores, LLC and Landlord that was included on the Original Assumption List and proposed to assign the Lease Agreement to Massa Furniture, Inc (“Massa Furniture”).

4. Attached as **Exhibit A** is a revised Assumption Order (the “Revised Assumption Order”), which resolves the MFBY Objection. A redline comparing the Revised Assumption Order to the Assumption Order is attached here to **Exhibit B**. As part of the resolution MFBY Objection, Landlord has agreed that the Lease can be assumed and assigned as set forth in the Revised Assumption Order.

5. The Revised Assumption Order has been shared with counsel to MFBY and counsel to Massa Furniture and neither party objects to entry of the Revised Assumption Order.

6. Any unresolved objections and informal comments received regarding the remaining balance of the leases included in the First Assumption Notice (collectively, the “Outstanding Leases”) are not included in the Revised Assumption Order. For the avoidance of doubt, the First Assumption Notice remains pending, and has not been withdrawn, with respect to the Outstanding Leases. To the extent that the Debtors and the objecting landlords reach agreement with respect to any Outstanding Lease, the Debtors will submit a proposed form of order with respect to such lease.

7. Accordingly, the Debtors request entry of the Revised Assumption Order attached hereto as **Exhibit A** at the Court's earliest convenience.

Dated: June 6, 2025
Wilmington, Delaware

/s/ Michael E. Fitzpatrick

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